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VIA ECF

Honorable Ona T. Wang
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Antonio Ramales Bonilla v. Salty Dog Rest. Ltd., et al.
Docket No. 23-cv-03076 (PAE)(OTW)

Dear Judge Wang:

This office was recently retained to represent the Defendants in the above-referenced action. We write, with the consent of Plaintiff's counsel, to respectfully request that the July 19, 2023 Initial Conference and the deadline to submit a Proposed Case Management Plan, be adjourned thirty (30) days, or to a date otherwise convenient for the Court.

The reason for this request is that Defendants' current deadline to respond to the Complaint is July 24, 2023 (as per the recently submitted Waivers of Service), which is after the scheduled Initial Conference and deadline to submit a Proposed Case Management Plan. Moreover, the undersigned is still collecting and reviewing relevant information necessary for its response to the Complaint and defense of this matter. Finally, the parties have recently begun to discuss the concept of a resolution and require additional time to continue engaging in good faith discussions. This is Defendants' first request to adjourn the Initial Conference and corresponding submission deadline.

Thank you for the Court's consideration of this request.

Respectfully submitted,

Littler Mendelson, P.C.

/s/ Matthew R. Capobianco

Matthew R. Capobianco

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